

<i>SERFF Tracking Number:</i>	<i>USAA-125756448</i>	<i>State:</i>	<i>Arkansas</i>
<i>First Filing Company:</i>	<i>Garrison Property and Casualty Insurance Company, ...</i>	<i>State Tracking Number:</i>	<i>EFT \$100</i>
<i>Company Tracking Number:</i>	<i>USAA-125756448</i>		
<i>TOI:</i>	<i>17.2 Other Liability - Occurrence Only</i>	<i>Sub-TOI:</i>	<i>17.2021 Personal Umbrella & Excess</i>
<i>Product Name:</i>	<i>2008 Umbrella Rate Revision</i>		
<i>Project Name/Number:</i>	<i>2008 Umbrella Rate Revision /UMB CW</i>		

Filing at a Glance

Companies: Garrison Property and Casualty Insurance Company, United Services Automobile Association, USAA Casualty Insurance Company, USAA General Indemnity Company

Product Name: 2008 Umbrella Rate Revision SERFF Tr Num: USAA-125756448 State: Arkansas

TOI: 17.2 Other Liability - Occurrence Only SERFF Status: Closed State Tr Num: EFT \$100

Sub-TOI: 17.2021 Personal Umbrella & Excess Co Tr Num: USAA-125756448 State Status: Fees verified and received

Filing Type: Rate Co Status: Reviewer(s): Alexa Grissom, Betty Montesi

Authors: Nick Almendarez, Rosanna Tenorio Disposition Date: 08/14/2008

Date Submitted: 08/06/2008 Disposition Status: Filed

Effective Date Requested (New): 10/15/2008 Effective Date (New): 10/15/2008

Effective Date Requested (Renewal): 10/15/2008 Effective Date (Renewal):

State Filing Description:

General Information

Project Name: 2008 Umbrella Rate Revision	Status of Filing in Domicile: Pending
Project Number: UMB CW	Domicile Status Comments:
Reference Organization:	Reference Number:
Reference Title:	Advisory Org. Circular:
Filing Status Changed: 08/14/2008	
State Status Changed: 08/14/2008	Deemer Date:
Corresponding Filing Tracking Number:	
Filing Description:	

USAA Group including United Services Automobile Association (USAA), USAA Casualty Insurance Company (USAA-CIC), USAA General Indemnity Company (USAA-GIC), and Garrison Property and Casualty Insurance Company (Garrison) wish to revise our premiums for an overall effect of 7%. The effects by company apply to USAA-7%, USAA-CIC-7%, USAA-GIC-7%, Garrison-7.1%, and USAA Group-7%.

<i>SERFF Tracking Number:</i>	<i>USAA-125756448</i>	<i>State:</i>	<i>Arkansas</i>
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<i>Project Name/Number:</i>	<i>2008 Umbrella Rate Revision /UMB CW</i>		

The proposed change will revise the basic premium. This revision will apply to all policies effective October 15, 2008.
The details of this filing are enclosed for your review.

Company and Contact

Filing Contact Information

Rosanna Tenorio, Compliance Analyst	rosanna.tenorio@usaa.com
2100 ATTN Regulatory Compliance A03W B2	(800) 531-8722 [Phone]
San Antonio, TX 78284-8496	(210) 498-6675[FAX]

Filing Company Information

Garrison Property and Casualty Insurance Company	CoCode: 21253	State of Domicile: Texas
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9800 Fredericksburg Road	Group Code: 200	Company Type: Stock
San Antonio, TX 78284-8496	Group Name: USAA	State ID Number:
(800) 531-8722 ext. [Phone]	FEIN Number: 43-1803614	

United Services Automobile Association	CoCode: 25941	State of Domicile: Texas
9800 Fredericksburg Road	Group Code: 200	Company Type: Reciprocal
San Antonio, TX 78288	Group Name: USAA	State ID Number:
(800) 531-8722 ext. [Phone]	FEIN Number: 74-0959140	

USAA Casualty Insurance Company	CoCode: 25968	State of Domicile: Texas
9800 Fredericksburg Road	Group Code: 200	Company Type: Stock
San Antonio, TX 78288	Group Name: USAA	State ID Number:
(800) 531-8722 ext. [Phone]	FEIN Number: 59-3019540	

USAA General Indemnity Company	CoCode: 18600	State of Domicile: Texas
9800 Fredericksburg Road	Group Code: 200	Company Type: Stock
San Antonio, TX 78288	Group Name: USAA	State ID Number:
(800) 531-8722 ext. [Phone]	FEIN Number: 74-1718283	

SERFF Tracking Number: USAA-125756448 State: Arkansas

First Filing Company: Garrison Property and Casualty Insurance State Tracking Number: EFT \$100
Company, ...

Company Tracking Number: USAA-125756448

TOI: 17.2 Other Liability - Occurrence Only Sub-TOI: 17.2021 Personal Umbrella & Excess

Product Name: 2008 Umbrella Rate Revision

Project Name/Number: 2008 Umbrella Rate Revision /UMB CW

Filing Fees

Fee Required? Yes

Fee Amount: \$100.00

Retaliatory? No

Fee Explanation: \$100 per rate filing

Per Company: No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
Garrison Property and Casualty Insurance Company	\$0.00	08/06/2008	
United Services Automobile Association	\$100.00	08/06/2008	21809856
USAA Casualty Insurance Company	\$0.00	08/06/2008	
USAA General Indemnity Company	\$0.00	08/06/2008	

<i>SERFF Tracking Number:</i>	<i>USAA-125756448</i>	<i>State:</i>	<i>Arkansas</i>
<i>First Filing Company:</i>	<i>Garrison Property and Casualty Insurance Company, ...</i>	<i>State Tracking Number:</i>	<i>EFT \$100</i>
<i>Company Tracking Number:</i>	<i>USAA-125756448</i>		
<i>TOI:</i>	<i>17.2 Other Liability - Occurrence Only</i>	<i>Sub-TOI:</i>	<i>17.2021 Personal Umbrella & Excess</i>
<i>Product Name:</i>	<i>2008 Umbrella Rate Revision</i>		
<i>Project Name/Number:</i>	<i>2008 Umbrella Rate Revision /UMB CW</i>		

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Filed	Alexa Grissom	08/14/2008	08/14/2008

SERFF Tracking Number: USAA-125756448 State: Arkansas

First Filing Company: Garrison Property and Casualty Insurance Company, ... State Tracking Number: EFT \$100

Company Tracking Number: USAA-125756448

TOI: 17.2 Other Liability - Occurrence Only Sub-TOI: 17.2021 Personal Umbrella & Excess

Product Name: 2008 Umbrella Rate Revision

Project Name/Number: 2008 Umbrella Rate Revision /UMB CW

Disposition

Disposition Date: 08/14/2008

Effective Date (New): 10/15/2008

Effective Date (Renewal):

Status: Filed

Comment:

Company Name:	Overall % Rate Impact:	Written Premium Change for this Program:	# of Policy Holders Affected for this Program:	Premium:	Maximum % Change (where required):	Minimum % Change (where required):	Overall % Indicated Change:
Garrison Property and Casualty Insurance Company	7.100%	\$64	3	\$900	7.100%	7.100%	7.100%
United Services Automobile Association	7.000%	\$19,655	1,247	\$280,780	7.100%	5.600%	7.100%
USAA Casualty Insurance Company	7.000%	\$2,934	170	\$41,913	7.100%	6.300%	7.100%
USAA General Indemnity Company	7.000%	\$0	0	\$0	0.000%	0.000%	7.100%

<i>SERFF Tracking Number:</i>	<i>USAA-125756448</i>	<i>State:</i>	<i>Arkansas</i>
<i>First Filing Company:</i>	<i>Garrison Property and Casualty Insurance Company, ...</i>	<i>State Tracking Number:</i>	<i>EFT \$100</i>
<i>Company Tracking Number:</i>	<i>USAA-125756448</i>		
<i>TOI:</i>	<i>17.2 Other Liability - Occurrence Only</i>	<i>Sub-TOI:</i>	<i>17.2021 Personal Umbrella & Excess</i>
<i>Product Name:</i>	<i>2008 Umbrella Rate Revision</i>		
<i>Project Name/Number:</i>	<i>2008 Umbrella Rate Revision /UMB CW</i>		

Overall Rate Information for Multiple Company Filings

Overall Percentage Rate Indicated For This Filing	7.100%
Overall Percentage Rate Impact For This Filing	7.000%
Effect of Rate Filing-Written Premium Change For This Program	\$22,653
Effect of Rate Filing - Number of Policyholders Affected	1,420

SERFF Tracking Number: USAA-125756448 State: Arkansas

First Filing Company: Garrison Property and Casualty Insurance State Tracking Number: EFT \$100
Company, ...

Company Tracking Number: USAA-125756448

TOI: 17.2 Other Liability - Occurrence Only Sub-TOI: 17.2021 Personal Umbrella & Excess

Product Name: 2008 Umbrella Rate Revision

Project Name/Number: 2008 Umbrella Rate Revision /UMB CW

Item Type	Item Name	Item Status	Public Access
Supporting Document	Uniform Transmittal Document-Property & Casualty	Filed	Yes
Supporting Document	NAIC Loss Cost Filing Document for OTHER than Workers' Comp	Filed	Yes
Supporting Document	NAIC loss cost data entry document	Filed	Yes
Supporting Document	Filing Support	Filed	Yes
Rate	General Rules	Filed	Yes

SERFF Tracking Number:	USAA-125756448	State:	Arkansas
First Filing Company:	Garrison Property and Casualty Insurance Company, ...	State Tracking Number:	EFT \$100
Company Tracking Number:	USAA-125756448		
TOI:	17.2 Other Liability - Occurrence Only	Sub-TOI:	17.2021 Personal Umbrella & Excess
Product Name:	2008 Umbrella Rate Revision		
Project Name/Number:	2008 Umbrella Rate Revision /UMB CW		

Rate Information

Rate data applies to filing.

Filing Method:	File and Use
Rate Change Type:	Increase
Overall Percentage of Last Rate Revision:	10.000%
Effective Date of Last Rate Revision:	10/15/2007
Filing Method of Last Filing:	File and Use

Company Rate Information

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	# of Policy Holders Affected for this Program:	Premium:	Maximum % Change (where required):	Minimum % Change (where required):
Garrison Property and Casualty Insurance Company	7.100%	7.100%	\$64	3	\$900	7.100%	7.100%
United Services Automobile Association	7.100%	7.000%	\$19,655	1,247	\$280,780	7.100%	5.600%
USAA Casualty Insurance Company	7.100%	7.000%	\$2,934	170	\$41,913	7.100%	6.300%
USAA General Indemnity Company	7.100%	7.000%	\$0	0	\$0	0.000%	0.000%

<i>SERFF Tracking Number:</i>	<i>USAA-125756448</i>	<i>State:</i>	<i>Arkansas</i>
<i>First Filing Company:</i>	<i>Garrison Property and Casualty Insurance Company, ...</i>	<i>State Tracking Number:</i>	<i>EFT \$100</i>
<i>Company Tracking Number:</i>	<i>USAA-125756448</i>		
<i>TOI:</i>	<i>17.2 Other Liability - Occurrence Only</i>	<i>Sub-TOI:</i>	<i>17.2021 Personal Umbrella & Excess</i>
<i>Product Name:</i>	<i>2008 Umbrella Rate Revision</i>		
<i>Project Name/Number:</i>	<i>2008 Umbrella Rate Revision /UMB CW</i>		

Overall Rate Information for Multiple Company Filings

Overall % Rate Indicated:	7.100%
Overall Percentage Rate Impact For This Filing:	7.000%
Effect of Rate Filing - Written Premium Change For This Program:	\$22,653
Effect of Rate Filing - Number of Policyholders Affected:	1420

SERFF Tracking Number:	USAA-125756448	State:	Arkansas
First Filing Company:	Garrison Property and Casualty Insurance Company, ...	State Tracking Number:	EFT \$100
Company Tracking Number:	USAA-125756448		
TOI:	17.2 Other Liability - Occurrence Only	Sub-TOI:	17.2021 Personal Umbrella & Excess
Product Name:	2008 Umbrella Rate Revision		
Project Name/Number:	2008 Umbrella Rate Revision /UMB CW		

Rate/Rule Schedule

Review Status:	Exhibit Name:	Rule # or Page #:	Rate Action	Previous State Filing Attachments Number:
Filed	General Rules	pg 3	Replacement	UMBAR00010CGR01 General Rules.pdf

ARKANSAS
PERSONAL UMBRELLA BASE RATES
AND FACTOR TABLES

A. Basic

1.

Base Premium	\$ 264.25
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2.

Territory Factor
Entire State: 1.00

3.

VEHICLE AND DRIVER FACTOR

NUMBER OF VEHICLES	NUMBER OF DRIVERS						
	0	1	2	3	4	5	6+
0	.42	.44	.46	.46	.46	.46	.46
1	.67	.70	.74	.77	.77	.77	.77
2	.85	.95	1.00	1.05	1.10	1.10	1.10
3	.98	1.11	1.24	1.30	1.37	1.43	1.43
4	.98	1.20	1.36	1.52	1.60	1.68	1.76
5	.98	1.20	1.43	1.62	1.81	1.90	2.00
6 OR MORE	.98	1.20	1.43	1.65	1.87	2.09	2.20

Includes all Auto, Trucks, Motorcycles, and Motorized Homes.

<i>SERFF Tracking Number:</i>	<i>USAA-125756448</i>	<i>State:</i>	<i>Arkansas</i>
<i>First Filing Company:</i>	<i>Garrison Property and Casualty Insurance Company, ...</i>	<i>State Tracking Number:</i>	<i>EFT \$100</i>
<i>Company Tracking Number:</i>	<i>USAA-125756448</i>		
<i>TOI:</i>	<i>17.2 Other Liability - Occurrence Only</i>	<i>Sub-TOI:</i>	<i>17.2021 Personal Umbrella & Excess</i>
<i>Product Name:</i>	<i>2008 Umbrella Rate Revision</i>		
<i>Project Name/Number:</i>	<i>2008 Umbrella Rate Revision /UMB CW</i>		

Supporting Document Schedules

Satisfied -Name:	Uniform Transmittal Document-Property & Casualty	Review Status:	Filed	08/14/2008
Comments:				
Attachment:	PC RRFS-1- 3-1-2007.pdf			

Bypassed -Name:	NAIC Loss Cost Filing Document for OTHER than Workers' Comp	Review Status:	Filed	08/14/2008
Bypass Reason:	N/A			
Comments:				

Satisfied -Name:	NAIC loss cost data entry document	Review Status:	Filed	08/14/2008
Comments:				
Attachment:	RF-1.pdf			

Satisfied -Name:	Filing Support	Review Status:	Filed	08/14/2008
Comments:				
Attachments:	Filing Supp Memo _Arkansas_ - 10-15-08.pdf			
	CW UM Explanatory Short.pdf			
	2008 Countrywide Rate Indication - GROUP (10-15-08).pdf			
	CW UM Inv Inc Exh 06.pdf			

RATE/RULE FILING SCHEDULE

(This form must be provided ONLY when making a filing that includes rate-related items such as Rate; Rule; Rate & Rule; Reference; Loss Cost; Loss Cost & Rule or Rate, etc.)

(Do not refer to the body of the filing for the component/exhibit listing, unless allowed by state.)

1.	This filing transmittal is part of Company Tracking #	USAA-125756448
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2.	This filing corresponds to form filing number (Company tracking number of form filing, if applicable)	
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☒ Rate Increase ☐ Rate Decrease ☐ Rate Neutral (0%)

3.	Filing Method (Prior Approval, File & Use, Flex Band, etc.)	
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4a. Rate Change by Company (As Proposed)							
Company Name	Overall % Indicated Change (when applicable)	Overall % Rate Impact	Written premium change for this program	# of policyholders affected for this program	Written premium for this program	Maximum % Change (where required)	Minimum % Change (where required)
USAA	7.1	7.0	19,655	1,247	280,780	7.1	5.6
USAA-CIC	7.1	7.0	2,934	170	41,913	7.1	6.3
USA-GIC	7.1	7.0	N/A	N/A	N/A	N/A	N/A
GARRISON	7.1	7.1	64	3	900	7.1	7.1

4b. Rate Change by Company (As Accepted) For State Use Only							
Company Name	Overall % Indicated Change (when applicable)	Overall % Rate Impact	Written premium change for this program	# of policyholders affected for this program	Written premium for this program	Maximum % Change	Minimum % Change

5. Overall Rate Information (Complete for Multiple Company Filings only)			
		COMPANY USE	STATE USE
5a	Overall percentage rate indication (when applicable)	7.1%	
5b	Overall percentage rate impact for this filing	7.0%	
5c	Effect of Rate Filing – Written premium change for this program	22,653	
5d	Effect of Rate Filing – Number of policyholders affected	1,420	

6.	Overall percentage of last rate revision	10.0%
7.	Effective Date of last rate revision	10-15-07
8.	Filing Method of Last filing (Prior Approval, File & Use, Flex Band, etc.)	File and Use

9.	Rule # or Page # Submitted for Review	Replacement or withdrawn?	Previous state filing number, if required by state
01	General Rules page 3	[] New [x] Replacement [] Withdrawn	UMBAR00010CGR01
02		[] New [] Replacement [] Withdrawn	

NAIC LOSS COST DATA ENTRY DOCUMENT

1.	This filing transmittal is part of Company Tracking #	USAA-125756448
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2.	If filing is an adoption of an advisory organization loss cost filing, give name of Advisory Organization and Reference/ Item Filing Number	
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	Company Name		Company NAIC Number
3.	A.	USAA Group	B. 200-25941, 200-25968, 200-18600, 200-21253

	Product Coding Matrix Line of Business (i.e., Type of Insurance)		Product Coding Matrix Line of Insurance (i.e., Sub-type of Insurance)
4.	A.	17.2 Other Liability-Occurrence Only	B. 17.2021 Personal Umbrella& Excess

5.

(A) COVERAGE (See Instructions)	(B) Indicated % Rate Level Change	(C) Requested % Rate Level Change	FOR LOSS COSTS ONLY				
			(D) Expected Loss Ratio	(E) Loss Cost Modification Factor	(F) Selected Loss Cost Multiplier	(G) Expense Constant (If Applicable)	(H) Co. Current Loss Cost Multiplier
Umbrella	7.1%	7.0%					
TOTAL OVERALL EFFECT							

6.

5 Year History

Rate Change History

Year	Policy Count	% of Change	Effective Date	State Earned Premium (000)	Incurred Losses (000)	State Loss Ratio	Countrywide Loss Ratio
2007	1,420	10.0%	10-15-07	305	250	82%	64%
2006	1,306	5.0%	2-1-06	277	417	151%	35%
2005	1,221	5.0%	2-1-05	262	-13	-5%	57%
2004	1,178	N/A	N/A	251	-80	-32%	66%
2003	1,153	0.0%	11-1-03	249	1063	426%	74%

7.

Expense Constants	Selected Provisions
A. Total Production Expense	20.4%
B. General Expense	1.6%
C. Taxes, License & Fees	2.0%
D. Underwriting Profit & Contingencies	5.4%
E. Other (explain)	N/A
F. TOTAL	29.4%

8. N Apply Lost Cost Factors to Future filings? (Y or N)

9. 7.1% Estimated Maximum Rate Increase for any Insured (%). Territory (if applicable): N/A

10. N/A Estimated Maximum Rate Decrease for any Insured (%) Territory (if applicable): N/A

**USAA Group
Personal Umbrella Liability
Arkansas
Filing Memorandum**

United Services Automobile Association (USAA, USAA-CIC, USAA-GIC, and Garrison) wish to revise our premiums for an overall effect of 7.0%. The effects by company apply as follows:

USAA	7.0%
USAA-CIC	7.0%
USAA-GIC	7.0%
Garrison	7.1%
USAA Group	7.0%

With these proposed changes we will be revising the basic premium. An effective date of October 15, 2008 for these revisions will apply to all policies. Details of these revisions are attached.

**USAA Group
Personal Umbrella Liability
Arkansas
Explanatory Memorandum**

Exhibit I – illustrates USAA Group Countrywide experience for the latest five accident years ending December 31, 2007 as of March 31, 2008. The indicated rate level change is developed in this exhibit and the proposed change is also provided.

Exhibit II – displays the premium trend data for USAA and USAA-CIC. The current amount factors and trended amount selections are shown.

Exhibit III – develops the earned premium to current rate level for USAA and USAA-CIC. The earned premium is brought to present rates by applying the premium at present rates factor. The current and trended amount premium factors selected in Exhibit II are then applied to come up with the Prospective Earned Premium at Current Rate Level.

Exhibit IV – displays the calculation of USAA Group Countrywide loss development factors.

Exhibit V - develops the loss adjustment expense (LAE) factor used in calculating the indication in Exhibit I. The factor is based upon USAA Group countrywide data for calendar years 2005, 2006, and 2007.

Exhibit VI - shows the loss trend underlying the rate level indication. The loss trend data is based on trended Auto BI losses with losses of \$300,000 or greater. Various exponential fits including 16-, 12-, 8-, and 4-points are shown. The selected current cost factors and trended cost factors are based on the results of these exponential fits. Current cost factor and trended cost factor are displayed.

Exhibit VII - shows the development of the variable permissible loss and LAE ratio on Page 1. The calculation of the selected annual expense trend is shown on Page 2. The trend is derived by taking a weighted average of the Employment Cost Index and the Consumer Price Index. The expense trend is used to trend fixed expenses, which are used to develop the indication shown in Exhibit I.

Exhibit VIII - details USAA Group's method for selecting its underwriting profit and contingency provision, which is included in the permissible loss ratio. A separate explanatory memorandum is included with the exhibit.

USAA GROUP
COUNTRYWIDE UMBRELLA
UNDERWRITING PROFIT PROVISION
EXPLANATORY MEMORANDUM

This exhibit is submitted in support of the underwriting profit and contingency provision included in the permissible loss ratio.

UNDERWRITING PROFIT PROVISION

The target underwriting profit and contingency provision needed to achieve our desired overall profit level is developed on Page 2. The selected target rate of return is 10% on GAAP (generally accepted accounting principles) equity.

The target underwriting return on an after-tax basis is derived by subtracting the after-tax investment rate of return on GAAP surplus from the target rate of return. This target underwriting rate of return is then adjusted to a before-tax basis, using the current corporate tax rate of 35%, and then divided by the premium-to-surplus ratio to yield the target underwriting profit and contingency provision.

TARGET RATE OF RETURN

USAA's selected target rate of return of 10% is supported by results from the Capital Asset Pricing Model (CAPM), the financial model commonly used in evaluating investments.

The data points used in the CAPM method are published historical values from Value Line, Inc.'s *Investment Survey* (as of 3/24/06) and from Ibbotson Associates' 2007 Stocks, Bonds, Bills & Inflation (SBBI) Yearbook. The companies composing the "P&C Insurance Industry", as identified by Value Line, Inc., were selected to determine the appropriate rate of return for a P&C company.

INVESTMENT RATE OF RETURN

The investment rate of return is determined by dividing the estimated investment earnings by the Countrywide Umbrella allocation of USAA Group surplus. The estimated investment earnings are calculated by applying a selected after-tax rate of return to the total funds subject to investment.

The selected after-tax rate of return is a weighted average after-tax return, using the projected proportion of the portfolio held in each component as weight. The composition of the portfolio is projected for 2008 and 2009 and an after-tax return for each year is calculated.

USAA GROUP
Countrywide Rate Level Indication
Personal Umbrella Liability

Calendar Accident Year	Prospective Earned Premium at Present Rates ^A	Incurred Losses	Loss Development Factor ^B	Loss Trend Factor ^C	LAE Ratio ^D	Prospective Incurred Losses and LAE (7) = (3) * (4) * (5) * (6)	Prospective Loss Ratio (8) = (7) / (2)	Weight
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
2003	\$89,737,965	\$34,229,144	1.064	1.571	1.090	\$62,364,917	0.6950	0.20
2004	\$92,167,312	\$35,932,225	1.074	1.483	1.090	\$62,381,533	0.6768	0.20
2005	\$97,341,463	\$40,963,481	1.193	1.399	1.090	\$74,521,487	0.7656	0.20
2006	\$101,086,075	\$40,574,232	1.364	1.320	1.090	\$79,627,872	0.7877	0.20
2007	\$108,178,596	\$37,925,453	1.901	1.245	1.090	\$97,838,265	0.9044	0.20

Five-Year Loss Ratio	76.6%
Trended Fixed Expense Provision ^E	22.6%
Variable Permissible Loss Ratio ^E	92.6%
Indicated Rate Change	7.1%
Proposed Rate Change	7.0%

^A Developed in Exhibit III

^B Developed in Exhibit IV

^C Developed in Exhibit VI

^D Developed in Exhibit V

^E Developed in Exhibit VII, Page 1 of 2

USAA GROUP
Premium Trend
Personal Umbrella Liability

USAA				
Year Ending Quarter	Average Earned Premium at Present Rates	Current Amount Factors	Annual Change	
01-03	366.49	0.9423		
02-03	366.18			
03-03	365.19			
04-03	363.81			
01-04	362.76	0.9433	-1.0%	
02-04	363.81		-0.6%	
03-04	365.28		0.0%	
04-04	363.41		-0.1%	
01-05	363.16	0.9643	0.1%	
02-05	362.43		-0.4%	
03-05	360.82		-1.2%	
04-05	355.48		-2.2%	
01-06	351.85	0.9938	-3.1%	
02-06	348.19		-3.9%	
03-06	344.72		-4.5%	
04-06	344.95		-3.0%	
01-07	346.77	1.0000	-1.4%	
02-07	343.46		-1.4%	
03-07	342.90		-0.5%	
04-07	342.80		-0.6%	
	RSQ	Annual Fit		
		Low	Est	High
20-pts	0.885	-1.9%	-1.7%	-1.4%
16-pts	0.902	-2.4%	-2.0%	-1.6%
12-pts	0.885	-2.9%	-2.3%	-1.7%
8-pts	0.737	-2.0%	-1.3%	-0.5%
4-pts	0.733	-4.0%	-1.4%	1.2%

Trended Amount Selection

-1.0%

CIC				
Year Ending Quarter	Average Earned Premium at Present Rates	Current Amount Factors	Annual Change	
01-03	336.59	1.0442		
02-03	337.36			
03-03	337.99			
04-03	337.69			
01-04	335.65	1.0280	-0.3%	
02-04	337.47		0.0%	
03-04	341.96		1.2%	
04-04	343.01		1.6%	
01-05	344.67	1.0233	2.7%	
02-05	346.35		2.6%	
03-05	346.61		1.4%	
04-05	344.59		0.5%	
01-06	344.99	1.0144	0.1%	
02-06	344.96		-0.4%	
03-06	344.62		-0.6%	
04-06	347.62		0.9%	
01-07	351.42	1.0000	1.9%	
02-07	350.22		1.5%	
03-07	351.27		1.9%	
04-07	352.63		1.4%	
	RSQ	Annual Fit		
		Low	Est	High
20-pts	0.886	0.8%	1.0%	1.2%
16-pts	0.821	0.8%	1.0%	1.3%
12-pts	0.671	0.4%	0.8%	1.2%
8-pts	0.864	0.9%	1.5%	2.0%
4-pts	0.375	-1.5%	0.5%	2.7%

Trended Amount Selection

1.0%

USAA GROUP
Determination of Premium at Current Rate Level
Personal Umbrella Liability

USAA						
Calendar Year (1)	Earned Premium (2)	PPR Factors (3)	Current Amount Factors (4)	Trended Amount Factors (5)	Premium Trend Factors (6)	Prospective Earned Premium at Present Rates (7)
					(3)x(4)x(5)	(2) x (6)
2003	65,000,703	1.2725	0.9423	0.9772	1.1717	76,161,324
2004	67,943,134	1.2298	0.9433	0.9772	1.1336	77,020,337
2005	73,455,283	1.1543	0.9643	0.9772	1.0877	79,897,311
2006	76,858,777	1.0921	0.9938	0.9772	1.0606	81,516,419
2007	81,277,650	1.0724	1.0000	0.9772	1.0479	85,170,849

CIC						
Calendar Year (1)	Earned Premium (2)	PPR Factors (3)	Current Amount Factors (4)	Trended Amount Factors (5)	Premium Trend Factors (6)	Prospective Earned Premium at Present Rates (7)
					(3)x(4)x(5)	(2) x (6)
2003	9,930,252	1.2798	1.0442	1.0231	1.3672	13,576,641
2004	11,625,585	1.2388	1.0280	1.0231	1.3029	15,146,975
2005	14,395,240	1.1575	1.0233	1.0231	1.2118	17,444,152
2006	17,267,851	1.0920	1.0144	1.0231	1.1333	19,569,656
2007	20,980,984	1.0718	1.0000	1.0231	1.0966	23,007,747

USAA GROUP
Incurred Losses
Evaluated as of 3/31/08
Personal Umbrella Liability

Accident Year	Incurred Loss													
	15	27	39	51	63	75	87	99	111	123	135	147	159	171
12/31/1994	9,559,019	16,203,271	18,978,619	20,857,621	21,963,919	24,866,435	27,921,912	27,032,785	27,413,813	28,263,813	28,263,813	28,263,813	28,388,813	28,388,813
12/31/1995	7,985,154	13,557,828	15,960,947	19,256,406	18,541,458	18,550,260	18,250,360	18,362,257	18,362,157	18,425,238	18,425,238	18,425,238	18,425,238	
12/31/1996	6,315,449	13,048,910	18,868,067	22,673,044	26,175,102	26,144,297	26,108,752	26,328,352	26,623,175	26,630,281	26,628,181	26,628,181		
12/31/1997	7,878,735	19,547,987	21,180,328	28,337,002	27,300,469	30,162,841	27,942,002	27,942,000	27,942,000	28,492,807	28,492,807			
12/31/1998	9,363,972	18,766,783	26,097,323	29,233,423	30,167,421	33,131,220	33,351,119	33,701,219	33,676,119	33,676,119				
12/31/1999	7,262,531	15,348,498	22,269,518	25,899,613	26,180,058	26,893,959	27,526,315	27,226,315	27,251,215					
12/31/2000	4,759,425	10,429,849	14,191,021	16,895,059	17,218,944	20,186,560	20,850,576	21,136,727						
12/31/2001	8,499,618	18,179,767	22,859,733	24,773,221	25,178,621	25,573,620	24,948,619							
12/31/2002	16,130,483	23,410,587	25,393,607	28,159,941	28,227,105	27,656,102								
12/31/2003	17,689,312	24,775,750	31,218,300	35,451,176	34,229,144									
12/31/2004	22,282,584	33,385,233	36,430,271	35,932,225										
12/31/2005	32,482,115	43,100,803	40,963,481											
12/31/2006	34,648,457	40,574,232												
12/31/2007	37,925,453													

Accident Year	Age to Age Factors													
	15-27	27-39	39-51	51-63	63-75	75-87	87-99	99-111	111-123	123-135	135-147	147-159	159-171	
12/31/1994	1.695	1.171	1.099	1.053	1.132	1.123	0.968	1.014	1.031	1.000	1.000	1.004	1.000	
12/31/1995	1.698	1.177	1.206	0.963	1.000	0.984	1.006	1.000	1.003	1.000	1.000	1.000		
12/31/1996	2.066	1.446	1.202	1.154	0.999	0.999	1.008	1.011	1.000	1.000	1.000			
12/31/1997	2.481	1.084	1.338	0.963	1.105	0.926	1.000	1.000	1.020	1.000				
12/31/1998	2.004	1.391	1.120	1.032	1.098	1.007	1.010	0.999	1.000					
12/31/1999	2.113	1.451	1.163	1.011	1.027	1.024	0.989	1.001						
12/31/2000	2.191	1.361	1.191	1.019	1.172	1.033	1.014							
12/31/2001	2.139	1.257	1.084	1.016	1.016	0.976								
12/31/2002	1.451	1.085	1.109	1.002	0.980									
12/31/2003	1.401	1.260	1.136	0.966										
12/31/2004	1.498	1.091	0.986											
12/31/2005	1.327	0.950												
12/31/2006	1.171													
Average	1.787	1.227	1.149	1.018	1.059	1.009	0.999	1.004	1.011	1.000	1.000	1.002	1.000	
5 Yr Avg	1.370	1.129	1.101	1.003	1.059	0.993	1.004	1.002	1.011	N/A	N/A	N/A	N/A	
3 Yr Avg	1.332	1.100	1.077	0.995	1.056	1.011	1.004	1.000	1.007	1.000	1.000	N/A	N/A	
5 Yr Avg x hi/lo	1.393	1.144	1.110	1.010	1.047	1.002	1.006	1.000	1.008	N/A	N/A	N/A	N/A	
Selection	1.393	1.144	1.110	1.010	1.047	1.002	1.006	1.000	1.008	1.000	1.000	1.000	1.000	
Age to Ult Factors	15 - Ult	27 - Ult	39 - Ult	51 - Ult	63 - Ult	75 - Ult	87 - Ult	99 - Ult	111 - Ult	123 - Ult	135 - Ult	147 - Ult	159 - Ult	
	1.901	1.364	1.193	1.074	1.064	1.016	1.014	1.008	1.008	1.000	1.000	1.000	1.000	

USAA GROUP
Loss Adjustment Expense (LAE) Factor
Personal Umbrella Liability

Calendar Year Ending	Incurred Losses	LAE	LAE Ratio
12/31/05	49,826,066	4,871,787	0.0978
12/31/06	33,010,531	3,816,865	0.1156
12/31/07	65,304,216	4,209,444	0.0645
Average LAE Ratio			0.0926

Selected Umbrella LAE Ratio 9.0%

USAA GROUP
Loss Trend
Trended Auto Bodily Injury Losses In Excess Of \$300,000

Quarter	Frequency per 1,000 exposures	Annual Change	Severity	Annual Change	Pure Premium per Exposure	Annual Change
2003Q1	0.0314		420,444		13.20	
2003Q2	0.0330		436,876		14.42	
2003Q3	0.0465		487,285		22.66	
2003Q4	0.0432		449,426		19.42	
2004Q1	0.0346	10.2%	400,797	-4.7%	13.87	5.1%
2004Q2	0.0441	33.6%	402,777	-7.8%	17.76	23.2%
2004Q3	0.0389	-16.3%	447,294	-8.2%	17.40	-23.2%
2004Q4	0.0396	-8.3%	437,449	-2.7%	17.32	-10.8%
2005Q1	0.0416	20.2%	419,775	4.7%	17.46	25.9%
2005Q2	0.0331	-24.9%	405,633	0.7%	13.43	-24.4%
2005Q3	0.0421	8.2%	414,344	-7.4%	17.44	0.2%
2005Q4	0.0340	-14.1%	425,064	-2.8%	14.45	-16.6%
2006Q1	0.0447	7.5%	475,418	13.3%	21.25	21.7%
2006Q2	0.0373	12.7%	474,752	17.0%	17.71	31.9%
2006Q3	0.0368	-12.6%	444,228	7.2%	16.35	-6.3%
2006Q4	0.0427	25.6%	449,437	5.7%	19.19	32.8%
2007Q1	0.0354	-20.8%	469,711	-1.2%	16.63	-21.7%
2007Q2	0.0430	15.3%	511,318	7.7%	21.99	24.2%
2007Q3	0.0398	8.2%	476,378	7.2%	18.96	16.0%

Exponential Fits	R-Squared Value	Annualized Change	R-Squared Value	Annualized Change	R-Squared Value	Annualized Change
16-point fit	0.001	0%	0.478	4%	0.120	4%
12-point fit	0.013	1%	0.590	6%	0.222	8%
8-point fit	0.057	4%	0.349	6%	0.160	10%
4-point fit	0.002	-1%	0.376	11%	0.075	10%

	Frequency	Severity	Pure Premium
Current Cost Selection	1.00	1.06	1.06
Trended Cost Selection	1.00	1.10	1.10

Accident Year Ending	Loss Trend Factor						
	Current Cost Selection	Current Cost Period	Current Cost Factor	Trended Cost Selection	Trended Cost Period	Trended Cost Factor	Loss Trend Factor
	(1)	(2)	(3) = (1) ^ (2)	(4)	(5)	(6) = (4) ^ (5)	(7) = (3) * (6)
12/31/2003	1.060	4.000	1.262	1.100	2.296	1.245	1.571
12/31/2004	1.060	3.000	1.191	1.100	2.296	1.245	1.483
12/31/2005	1.060	2.000	1.124	1.100	2.296	1.245	1.399
12/31/2006	1.060	1.000	1.060	1.100	2.296	1.245	1.320
12/31/2007	1.060	0.000	1.000	1.100	2.296	1.245	1.245

USAA GROUP
Fixed and Variable Expense Provisions
Personal Umbrella Liability

	2006	2007	2-Year Average	Selected
(1) Average General Expenses Per Earned Exposure ^A	\$4.74	\$5.11		
(2) Selected Annual Expense Trend ^B	3.0%	3.0%		
(3) Trend Period ^C	3.296	2.296		
(4) Projected Average General Expenses Per Earned Exposure (1) * [1.03] ^ (3)	\$5.23	\$5.47	\$5.35	\$5.35
(5) Average Other Acquisition Expense Per Written Exposure ^A	\$63.59	\$66.08		
(6) Selected Annual Expense Trend ^B	3.0%	3.0%		
(7) Trend Period ^D	2.795	1.795		
(8) Projected Average Other Acquisition Expense Per Written Exposure (5) * [1.03] ^ (7)	\$69.07	\$69.68	\$69.38	\$69.38
(9) Average Licenses and Fees Expense Per Written Exposure ^A	\$1.81	\$2.06		
(10) Selected Annual Expense Trend ^B	3.0%	3.0%		
(11) Trend Period ^D	2.795	1.795		
(12) Projected Average Licenses and Fees Expense Per Written Exposure (9) * [1.03] ^ (11)	\$1.97	\$2.17	\$2.07	\$2.07
(13) Total Fixed Expense (4) + (8) + (12)				\$76.80
(14) Average Projected Premium at Present Rates ^A				\$340.30
(15) Projected Fixed Expense Provision (13) / (14)				0.226
(16) Commission and Brokerage	0.0%	0.0%	0.0%	0.0%
(17) Taxes ^E	2.0%	1.9%	2.0%	2.0%
(18) Profit and Contingencies Provision ^F				5.4%
(19) Total Variable Expenses (16) + (17) + (18)				7.4%
(20) Variable Permissible Loss and LAE Ratio 1 - (19)				92.6%

^A USAA Group Countrywide data

^B Developed in Exhibit VII, Page 2 of 2

^C From the midpoint of the respective year to the average earned date in effective period, 10/15/2009

^D From the midpoint of the respective year to the average written date in effective period, 04/15/2009

^E USAA Group Countrywide data as a percent of direct written premium

^F Developed in Exhibit VIII

USAA GROUP
Calculation of Annual Expense Trend
Personal Umbrella Liability

(1) Employment Cost Index - Finance, Insurance & Real Estate, excluding Sales Occupations - (annual change over latest 2 years ending 12/31/2007) U.S. Department of Labor	3.1%
(2) % of Other Acquisition and General Expenses used for Salaries and Employee Relations & Welfare - USAA Group Insurance Expense Exhibit, 2007	56.6%
(3) Consumer Price Index, All Items - (annual change over latest 2 years ending 12/31/2007)	2.4%
(4) Annual Expense Trend - $\{ (1) * (2) \} + \{ (3) * [1 - (2)] \}$	2.8%
Selected Annual Expense Trend	3.0%

USAA GROUP
COUNTRYWIDE UMBRELLA
UNDERWRITING PROFIT PROVISION

A. Target Rate of Return (% of GAAP Surplus)		
1.	Capital Asset Pricing Model	11.3%
2.	Selected Target Rate of Return	10.0%
B. Target Underwriting Rate of Return (% of GAAP Surplus)		
1.	Investment Rate of Return After Tax	7.4%
2.	Target Underwriting Return After Tax (A2) - (B1)	2.6%
3.	Target Underwriting Return Before Tax (B2) / (1.00 - 0.35)	4.0%
C. Target Underwriting Profit Provision (% of Direct Earned Premium)		
1.	Direct Written Premium / GAAP Surplus Ratio	0.741
2.	Indicated Underwriting Profit Provision (B3) / (C1)	5.4%
3.	Selected Underwriting Profit Provision	5.4%